

July 11, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

**Re: Comments of Western Wireless on the Third Order on
Reconsideration Further Notice of Proposed Rulemaking,
CC Docket no. 99-200, CC Docket No. 96-86, CC Docket
No. 95-116.**

Dear Ms. Dortch:

Western Wireless Corp. had an *ex parte* conversation today with Cheryl Callahan, Pam Slipakoff, Jared Carlson, Patrick Forster, and Jennifer Salhus highlighting written comments filed on May 6, 2002, in the proceeding referred to above (no discussion took place about the pending petition before the FCC to forbear from imposing local number portability on wireless carriers.) Joining me were my colleagues, Suzie Rao and Bob Keeger, who participated in the meeting via telephone conference call from our Bellevue, Washington headquarters.

My colleagues and I reiterated the two points that were made in our May 6th filing: 1) the FCC should not expand the list of the "largest 100 MSAs" to include the combined MSA (CMSAs). We described how such a decision would cause a market in which Western provides service (McAllen-Brownsville, Texas) to move from 126 to 75 on the MSA list; 2) the FCC should not require carriers to implement LNP inside the top 100 MSAs absent a carrier request for portability.

If you have any questions, then please contact me at 202-654-5903.

Respectfully submitted,

William Caton
April 1, 2002
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Mark Rubin
Director of Federal Government Affairs
Western Wireless Corp.